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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
(PORTLAND DIVISION)

JESSICA MURCH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GPS CAPITAL MARKETS, LLC,

Defendant.

Civil No. 3:24-cv-01854-SB

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANT TO APPEAR IN
RESPONSE TO PLAINTIFF'S
COMPLAINT**

LR 7-1 CERTIFICATION

Pursuant to LR 7-1, Defendant conferred with counsel for Plaintiff, who does not oppose this motion.

MOTION

Without waiving any defenses Defendant may have under Rule 12 of the Federal Rules of Civil Procedure or otherwise, pursuant to Rule 6 and LR 16-3, Defendant moves the Court for an Order extending the deadline for Defendant to appear and defend in response to Plaintiff's

Complaint to January 13, 2025. This extension does not affect any currently scheduled deadlines in this case.

MEMORANDUM

This action was filed on November 7, 2024, and Defendant was served on November 21, 2024. Defendant's deadline for its first appearance is due on December 12, 2024. Due to multiple weeks of depositions in another case and the upcoming holidays, and in order to properly represent the interests of his client, the undersigned counsel requires additional time to investigate the claims asserted and prepare an appropriate response. To that end, Defendant requests an extension to respond to the Complaint, with the new deadline of January 13, 2025. Plaintiff has agreed to this request. This extension is not sought for purposes of delay. In seeking the foregoing extension, Defendant does not waive, and expressly reserves, any and all rights, objections, arguments, and defenses relating to the Complaint and otherwise, including but not limited to all jurisdictional defenses, any arbitral rights, and the right to move to dismiss the Complaint or to move to compel arbitration of these proceedings.

DATED: December 5, 2024.

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